

1 **FEDERAL ELECTION COMMISSION**

2
3 **FACTUAL AND LEGAL ANALYSIS**

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5 **RESPONDENTS:**

MUR: 6734

6
7 John Canning Vincent Mai
8 Jeffrey Hurt Prem Reddy
9 Donald Simms Robert Beal
10 Susan Simms Richard Uihlein
11 David Wallace Philip Geier
12 Robert Reynolds L. Scott Frantz
13 David Boies John Cooney
14 Thomas Cushman Elizabeth Wiskemann
15 Joe Murphy Edward Donaghy
16 Thomas Fay Michael Keiser
17 Thomas Girardi John Roeser
18 Amy Goldman Josephine Freede
19 John Harris Don Scifres
20 David Herro Timothy Travis
21 Carl A. Davis William Smithburg
22 Kurt Wheeler Alan Sieroty
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25 **I. INTRODUCTION**

26 This matter was generated by a complaint filed with the Federal Election Commission
27 ("Commission") by Citizens for Responsibility and Ethics in Washington and Melanie Sloan
28 ("CREW") and the Campaign Legal Center and Paul S. Ryan ("CLC") alleging that 32
29 individuals violated 2 U.S.C. § 441a(a)(3)(A) and 11 C.F.R. § 110.5(b)(1)(i) by exceeding the
30 \$42,600 aggregate biennial limit for contributions to candidate committees during the 2012
31 election cycle.

32 **II. FACTUAL AND LEGAL ANALYSIS**

33 The Act and Commission regulations set biennial limits on the aggregate amount that an
34 individual may contribute to all authorized candidate committees during each two-year period
35 beginning on January 1 of an odd-numbered year and ending on December 31 of the next even-
36 numbered year. 2 U.S.C. § 441a(a)(3)(A); 11 C.F.R. § 110.5(b)(1)(i).

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